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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 OAKLAND DIVISION

13 UNITED STATES OF AMERICA, ) NO. CR 19-00274 JD  
14 Plaintiff, )  
15 v. ) STIPULATION AND [PROPOSED] ORDER TO  
16 DERRICK WILLIAM WHITE, ) CONTINUE STATUS CONFERENCE TO  
17 Defendant. ) SEPTEMBER 4, 2019 AT 10:30 A.M. AND TO  
18 \_\_\_\_\_) EXCLUDE TIME UNTIL SEPTEMBER 4, 2019

1       The above-entitled matter is currently scheduled for a hearing on July 31, 2019, at 10:30 a.m.,  
2 for status. The parties hereby stipulate to continue this hearing to September 4, 2019 at 10:30 a.m. to  
3 provide the parties additional time to discuss and reach a global resolution on this matter and a related  
4 Form 12. Both parties are available on the requested hearing date of September 4, 2019.

5       Both parties also require additional time for review of discovery, including discovery that the  
6 government is seeking that is currently in the state's possession. The parties stipulate that time be  
7 excluded under the Speedy Trial Act until September 4, 2019 to allow for effective preparation of  
8 counsel and review of discovery. The parties further stipulate and agree that the ends of justice served  
9 by excluding the time until September 4, 2019 from computation under the Speedy Trial Act outweigh  
10 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

11 IT IS SO STIPULATED.

12 DATED: July 29, 2019

DAVID L. ANDERSON  
United States Attorney

14 \_\_\_\_\_/s/  
15 LEAH PAISNER  
Special Assistant United States Attorney

17 DATED: July 29, 2019

18 \_\_\_\_\_/s/  
19 MARK GOLDROSEN  
Attorney for Defendant  
20 DERRICK WILLIAM WHITE

21 **[PROPOSED] ORDER**

22       Based on the reasons provided in the stipulation of the parties above and for good cause, the  
23 Court hereby continues the status hearing in this case to September 4, 2019 at 10:30 a.m.

24       Based upon the facts set forth in the stipulation of the parties and the representations made to the  
25 Court on July 29, 2019 and for good cause shown, the Court finds that failing to exclude the time up  
26 until September 4, 2019 would unreasonably deny defense counsel and the defendant the reasonable  
27 time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. §

28 STIPULATION AND [PROPOSED] ORDER

CR 19-00274 JD

1 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time until  
2 September 4, 2019 from computation under the Speedy Trial Act outweigh the best interests of the  
3 public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS  
4 HEREBY ORDERED that the time until September 4, 2019 shall be excluded from computation under  
5 the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

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7 IT IS SO ORDERED.

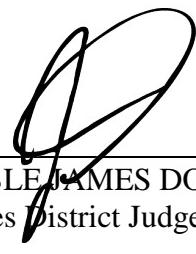
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9 DATED: July 30, 2019

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HONORABLE JAMES DONATO  
United States District Judge



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